

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CENTRAL LABORERS' PENSION	)	
FUND, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 19 C 0092
	)	
PORTER BROTHERS ASPHALT &	)	JUDGE ELAINE E. BUCKLO
SEALING, INC., an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, PORTER BROTHERS ASPHALT & SEALING, INC., an Illinois corporation, in the total amount of \$23,973.66, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,713.50.

On January 11, 2019, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 1, 2019. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon \_\_\_\_\_

Cecilia M. Scanlon  
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### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 20th day of March 2019:

Mr. Trent L. Bush, Registered Agent  
Porter Brothers Asphalt & Sealing, Inc.  
Ward Murray Pace & Johnson, P.C.  
202 E. Fifth Street  
PO Box 400  
Sterling, IL 61081

Mr. Matthew Porter, President  
Porter Brothers Asphalt & Sealing, Inc.  
1106 Industrial Park Road  
Rock Falls, IL 61071-3162

/s/ Cecilia M. Scanlon \_\_\_\_\_

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